



1220 L Street, Northwest
Washington, DC 20005-4070
202-682-8000

Howard J. Feldman
Director
Regulatory Analysis and Scientific Affairs
202-682-8340
202-682-8031 (fax)

January 7, 2003

Rebecca Kane
U.S. Environmental Protection Agency
Office of Enforcement and Compliance Assurance
MC 2222A
1200 Pennsylvania Avenue, NW
Washington, DC 20460

RE: Notice of Availability of Enforcement and Compliance History Online Web Site for 60-Day Comment Period (67 *Federal Register* 70079-70080; November 20, 2002) – Request for Comment Deadline Extension

Dear Ms. Kane:

Currently, comments on the Enforcement and Compliance History Online (ECHO) web site must be submitted no later than January 21, 2003. The American Petroleum Institute (API), a national trade association representing more than 400 member companies involved in all aspects of the oil and gas industry, requests a comment deadline extension of 60 days for the following reasons:

- Preliminary feedback from our members indicates that significant amounts of the data are incorrect.
- The original comment period was inadequate for a meaningful review of the data by API members, who own an enormous number of facilities covered by the web site.
- Our members are finding it even more difficult to thoroughly evaluate all of the data in the allotted comment period because of the holiday season.
- A 60-day extension would give adequate time for our members to evaluate the complete error correction process, i.e. from error notification through error correction.

In conclusion, a 60-day extension would allow our members an adequate amount of time to comment thoroughly on a complete evaluation of the ECHO web site prior to removal of the pilot designation. It is in the public's interest, EPA's interest and the interest of our members that all data disseminated through this web site are accurate. An extension will help API and our members work with the Agency toward the ultimate goal of data accuracy.

Sincerely,

A handwritten signature in black ink, appearing to read 'Howard J. Feldman', is written over a horizontal line.

Howard J. Feldman

Director

Regulatory Analysis and Scientific Affairs

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